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Proposed Attorneys for Debtor and Debtor in Possession

IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF OREGON

In re	)	Case No. 23-32366-pcm11
	)	
Local 8, International Longshoremen's and	)	DEBTOR'S PRECAUTIONARY MOTION
Warehousemen's Union,	)	TO EXTEND TIME TO SUPPLEMENT
	)	CASE MANAGEMENT DOCUMENTS
Debtor.	)	
	)	
	)	

Pursuant to 11 USC § 1188 and the Court's Order Setting Case Management Conference and Notice of Possible Dismissal [ECF 30] (the "Order"), the Debtor, Local 8, International Longshoremen's and Warehousemen's Union ("Debtor" or "Local 8") has provided its Response to the Case Management Order, including attachments consisting of Debtor's financial reports and information available as of November 2, 2023 (the "Response").

As a precaution, the Debtor moves the Court for an extension of up to 45 days as necessary to provide supplemental information for the reasons set forth in the Response, including that Local 8 filed this case on October 18, 2023 – less than 2 weeks ago.<sup>1</sup> During the first two weeks

<sup>1</sup> 11 USC § 1188 provides for a status conference not later than 60 days after entry of the order for relief.

1 of the case, Local 8 has attended to its “First Day Motions,” including confirming requirements of  
2 cash management with the U.S. Trustee’s office and other matters. Accordingly, Local 8 may need  
3 some additional time to provide all the information requested, although it believes its Response is  
4 substantially complete.

5 Dated this 2nd day of November, 2023.

6 SUSSMAN SHANK LLP

7 */s/ Susan S. Ford*

8 By \_\_\_\_\_  
9 Susan S. Ford, OSB No. 842203  
Proposed Attorneys for Debtor

1 CERTIFICATE OF SERVICE

2 I, Janine E. Hume declare as follows:

3 I am employed in the County of Multnomah, state of Oregon; I am over the age of eighteen  
4 years and am not a party to this action; my business address is 1000 SW Broadway, Suite 1400,  
5 Portland, Oregon 97205-3089, in said county and state.

6 I certify that on November 2, 2023, I served the **DEBTOR'S PRECAUTIONARY**  
7 **MOTION TO EXTEND TIME TO SUPPLEMENT CASE MANAGEMENT**  
8 **DOCUMENTS** on all ECF participants as indicated on the Court's Cm/ECF system.

9 I swear under penalty of perjury that the foregoing is true and correct to the best of my  
10 knowledge, information, and belief.

11 Dated: November 2, 2023.

12  
13 */s/ Janine E. Hume*

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Janine E. Hume, Legal Assistant

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